

MEMORANDUM

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To: McClendon Counsel, MDC and Centurion Administrations  
From: Counsel for Plaintiff-Intervenors  
RE: MDC Visit June 27, 2019  
Date: July 22, 2019

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] was housed on F-4 when counsel met with him. He reported that in the weeks prior to counsel's visit, his seizure medication had been disrupted, as set forth below under Medical Care, and as a result he experienced at least one grand mal seizure while the pod was locked down and no CO was present. He said that this occurred on a weekend. He reported that his cell mate was unable to call for assistance because the call buttons only rang to the desk and no CO was present. He said he tried to stay awake after the seizure, but fell asleep prior to the CO returning to the pod. Counsel understand that COs are now supposed to lock the control panel prior to leaving a pod so that the cell call buttons ring to master control. Please provide any directives issued to officers regarding this practice. Please provide any documentation of efforts to monitor whether this is happening.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]